

1 know of.

2 Q. Did Mr. Taylor's arrest stop All American  
3 from selling its advertising?

4 A. It stopped me from doing anything. I was  
5 extremely upset. Being that I was the girlfriend of  
6 a musician, you're used to girls in bars always being  
7 drunk, throwing themselves -- it's kind of hard to  
8 take, you know, and to add insult to injury that you  
9 would see a complaint that my now husband would stop  
10 in the middle of all that we were going through -- it  
11 was terrible for our family, all of us -- and  
12 possibly proposition a prostitute, to me, was beyond  
13 sick. There was a lot of stress in our home because  
14 of his mother dying. There was -- being on her death  
15 bed, because of family being there -- it was a small  
16 house. We were trying to still make money and I was  
17 still trying to work -- I was still working. I just  
18 pretty much just couldn't take it anymore. It was  
19 just too much stress. That was just the end of it  
20 for me at the time at that moment.

21 Q. That's why you left for a few weeks?

22 A. Yes, it is.

23 Q. So did you not work during those few  
24 weeks?

25 A. No, I did not.

1 Q. When you came back, did you start to work  
2 again?

3 A. Yes, I did.

4 Q. So more or less it was during that period  
5 of time when you moved out of the house that All  
6 American for a few weeks stopped selling or trying to  
7 sell?

8 A. I'll be honest, I never really -- it took  
9 awhile because still -- you know, even in the back of  
10 my head at that time was, you know, this is a police  
11 officer that said this, you know, and where I -- I  
12 was raised in the country and we were raised to trust  
13 the police. I would never have believed that this  
14 could be true. To me, it was just unbelievable. I  
15 never had any -- at that point in my life had not had  
16 any bad experiences with police officers. I've  
17 always had nothing but, you know, helpful -- you  
18 know, whenever I got a ticket, it was because I  
19 deserved it. I never had bad experiences. But I  
20 guess being a woman and being the woman of a  
21 musician -- and I've been hurt in the past, you know,  
22 because of it. It's hurtful to see that when he  
23 plays music -- it bothered me, you know. I mean,  
24 because there's always that little tiny, tiny, tiny  
25 thing in your head saying but a police officer wrote

1 this. And even though my better part of me -- the  
2 knowledgeable part, the person that knew him at that  
3 point for 15 or 16 years, it was in writing and it  
4 was on the Internet. I was scared that people were  
5 going to find out about it. I don't want my family  
6 to know about that. I definitely did not.

7 Q. Do you understand why you're saying -- my  
8 question was, though, that once a few weeks passed,  
9 you got back into the swing of things and selling for  
10 All American again?

11 A. As best as I could, yes. It wasn't a very  
12 good year for us after that, no.

13 Q. That's what I was asking before. Do you  
14 remember the revenues for All American for that year?

15 A. Not a lot. I want to say that year was  
16 probably the 18,000 range. I mean, it was low. I'm  
17 guessing here, but it was low because I really -- I  
18 wasn't emotionally or mentally ready to do it, ready  
19 to -- because this is the kind of business that you  
20 have to be on all the time in order to be a good  
21 salesperson.

22 Q. But you would be guessing if I asked you  
23 what the revenue was for 1999, right? You don't know  
24 what the revenue was for 1999?

25 A. No, I don't.

1 Q. Or 1998?

2 A. No.

3 Q. Or 2001?

4 A. No, but I know that there was a lot of  
5 time in 2000 that I did not work. I know that. I  
6 did not work. There would be days that I wouldn't  
7 want to do it; I know that.

8 Q. But isn't that true any year? You don't  
9 work every single hour of every single day?

10 A. I work every day except for Saturday and  
11 Sunday and sometimes I work Saturdays. By '02 I had  
12 decided that I was going to go and work in an office  
13 because I just lost interest in doing it all the time  
14 at home, you know, after -- it just seemed like  
15 things went downhill and I just -- by '02 I was  
16 working in an office so --

17 Q. So I thought you said before you worked  
18 for somebody else in '03 and '04?

19 A. I did. That's what I'm saying, '02, '03.

20 Q. You started in '02 for some other party?

21 A. Yes.

22 Q. Who was that?

23 A. It was a company called Pro Ads. I think  
24 that stands for Pro Advertising. I went to work for  
25 them in like June of '02, I believe it was.

1 Q. And you worked for them until about when?

2 A. They went out of business in -- they went  
3 out of business and I can't remember exactly when  
4 they went out of business. And then I went to work  
5 for a company that was an off branch of them, so to  
6 speak, where people that worked there started their  
7 own business called BDA, Business Directory  
8 Advertising.

9 Q. How long did you work for them?

10 A. Until '05.

11 Q. And who do you work for now?

12 A. I work for a company called DAS and I've  
13 worked for them since BDA ended in '05.

14 Q. And you get a 1099 from each one of these  
15 employers?

16 A. Yes, I do.

17 Q. Are there any other 1099s that either Mr.  
18 Taylor or you get?

19 A. No, I don't think so. No, not from -- we  
20 only get it from the -- from our work -- from -- we  
21 only get 1099s, of course, from the companies we work  
22 for. We're technically self-employed.

23 Q. So you don't get a W2 then either --

24 A. No.

25 Q. -- because you're self-employed?

1 A. Huh-uh.

2 Q. And I'm sorry, who did you say Mr. Taylor  
3 is working for now?

4 A. He's working at the same company I do,  
5 Directory Assistance Services, but sometimes he gets  
6 called by other companies because he's become a very  
7 good delivery guy, field rep, and sometimes he takes  
8 freelance jobs from them here and there.

9 Q. So is he doing better as time passes in  
10 that line of work? 2006, was that better than 2005  
11 and was that better than 2004 because he's getting  
12 known in that area?

13 A. I guess you could say in a way, but, you  
14 know, there's a big difference between being your own  
15 boss and being under someone else. You know, it's  
16 totally different when you're -- you're -- the only  
17 person you answer to is your girlfriend or your wife,  
18 you know what I'm saying, than to go to work for  
19 somebody else. But, yes, he does take other jobs,  
20 other than the company we're working for. He will  
21 take a freelance job, if he can do it. If it's  
22 feasible for him to do the job and it's going to be  
23 making money, you know, because his job is  
24 percentage, so he gets commissions -- all commission  
25 based.

1 MR. GANULIN: I don't think I have  
2 anything else, but Ms. Rutowski or Mr. Hardin  
3 might have some questions.

4 CROSS-EXAMINATION

5 BY MS. RUTOWSKI:

6 Q. Just briefly going back to 2000, you said  
7 that a lot of Mr. Taylor's family was staying with  
8 you due to his mother's illness?

9 A. Yes.

10 Q. Were you close with her?

11 A. His mother?

12 Q. His mother.

13 A. His mother had a stroke and didn't speak  
14 before I ever met him back in the '70s, okay, so she  
15 was not a person that you really would have had a  
16 relationship with. She was ill. She didn't talk or  
17 anything like that. So did I care for her? Of  
18 course. But did we ever have a conversation? No, we  
19 did not.

20 Q. When did she pass away?

21 A. In 2000. In 2000 March, 17th.

22 Q. And you said that with all the people in  
23 the house, you were trying to keep this whole  
24 incident from them?

25 A. Oh, yes.

1 Q. Were you able to do that?

2 A. Yes.

3 Q. You were determined?

4 A. Well, they just thought we had an  
5 argument. You know, they -- basically, you know,  
6 they thought that we had a big argument and I left,  
7 you know, for a while. So there was no way that I  
8 wanted them to know the real reason, no, and I  
9 certainly didn't want my kids -- at the time my  
10 daughter was six or seven and there's no way I would  
11 want -- I would have wanted that to happen. She --  
12 my daughter was older than that. My son was six, so  
13 my daughter would have been 12, close to 13, so there  
14 was no way I would have wanted that to get down to my  
15 kids. I mean, it's very embarrassing.

16 MS. RUTOWSKI: I don't have anything else.

17 CROSS-EXAMINATION

18 BY MR. HARDIN:

19 Q. I'm just a little confused and I need to  
20 go back and --

21 MR. TAYLOR: Who is this?

22 MR. GANULIN: Mr. Hardin and Ms. Rutowski  
23 represent the police union.

24 THE WITNESS: Okay. I'll try to clarify  
25 anything.



1 MR. GANULIN: They're representing Police  
2 Officer Hart.

3 MR. TAYLOR: I was not introduced to them,  
4 so I don't know.

5 MR. HARDIN: I'm sorry. I think I was in  
6 probably having surgery at the time of your  
7 deposition so I couldn't be here.

8 MR. TAYLOR: I see.

9 BY MR. HARDIN:

10 Q. When approximately did you start this  
11 initial business?

12 A. We did All American Marketing from '93 and  
13 we made our living at it --

14 Q. Okay.

15 A. -- all the way up until I went to work  
16 full-time at another company.

17 Q. And that full-time work would have been in  
18 2000 --

19 A. I think 2002.

20 Q. Okay. So from '93 to 2002, your income  
21 came from All American?

22 A. Other than whatever he made music wise.

23 Q. Okay. And did you share the income --

24 A. Well --

25 Q. -- that came in?

1           A.    There wasn't a lot to share, to be honest.  
2    Our business was at home, so after we paid expenses  
3    for living, you know, we had to pay the people to  
4    print the cover. We had to pay the art person that  
5    laid it out. We had to buy software, you know,  
6    because there's software that does the art. We had  
7    to provide these things to the people who did the  
8    covers for us. We bought copiers, computers,  
9    everything. Basically what we made that we didn't  
10   use for living went back into our business because we  
11   did eventually want to have a company -- more people.

12           Q.   Did you ever register with the state of  
13   Ohio or the secretary of Ohio -- secretary of  
14   state --

15           A.   We had an employer --

16           Q.   -- for your business?

17           A.   -- ID number. We had an EIN number and  
18   all that, yes.

19           Q.   You had both of those, the employer ID and  
20   the EIN number?

21           A.   We had the EIN. That's what we had to  
22   have.

23           Q.   And you filed federal tax returns?

24           A.   Yes.

25           Q.   And state tax returns?

1 A. Yes.

2 Q. And city tax returns?

3 A. As far as I know, yes. I did everything I  
4 was supposed to do.

5 Q. And that would show the total income that  
6 the company received and then show what deductions  
7 you took from the total income --

8 A. Right.

9 Q. -- to come up with a net profit?

10 A. Right.

11 Q. You always had a profit, right?

12 A. No, we did not always have a profit, you  
13 know, because so much was written off. You know,  
14 part of it -- you know, part of where you live,  
15 because we worked from home, and, you know, gas and  
16 everything else that -- I mean, we were not making a  
17 lot of money doing the business. The business was  
18 because I wanted to be home with my son from the time  
19 that he was a baby so that I could not have to send  
20 him to day care, so that I could be at home when my  
21 daughter got home from school. That was important to  
22 me. If I had wanted to make tons and tons of money,  
23 I could go work in an office and just sell ads.

24 Q. Right. There's no way that you can tell  
25 us today how much money your husband, Gradual Taylor,

1 made during those years '99 through 2002?

2 A. No. Not today, no.

3 Q. Or '93 through 2002?

4 A. No, there's not. I'm being as truthful as  
5 I can and trying to be as complete as I can. You  
6 know, our business at that time, because we had small  
7 children, was so that I could be at home. That was  
8 my goal. That was what I wanted to do. And I always  
9 knew that if I wanted to make really big money, which  
10 I do now, you know, I could go work for a company and  
11 do it.

12 Q. Okay. Your choice. And you were the  
13 person who really formulated the business and was  
14 running the business, right?

15 A. Well, without a sale, there is no  
16 business. That is just the way that it is in our  
17 business. It's not like, you know, he can go deliver  
18 phone book covers that doesn't have ads sold on them.  
19 You have to sell the ads.

20 Q. I'm just curious in 2000, when this  
21 incident occurred, he was supposed to be going to El  
22 Paso --

23 A. Yes, he was.

24 Q. -- with a delivery?

25 A. With two.

1 Q. Two deliveries?

2 A. Yes.

3 Q. How much -- what's involved in a delivery?

4 MR. TAYLOR: That's incorrect.

5 MR. HARDIN: Wait a minute. Just for the  
6 record, you can't participate.

7 MR. TAYLOR: I know that. I don't know  
8 what to do when something is going on that's  
9 just wrong.

10 A. As far as I know --

11 MR. GANULIN: Let's just take -- go off  
12 the record for one second.

13 (Off the record.)

14 MR. GANULIN: We should go back on the  
15 record now.

16 BY MR. HARDIN:

17 Q. Just so that we get the record straight,  
18 there was some discussion about the answer you just  
19 gave to me before --

20 A. Yes.

21 Q. -- right?

22 A. Yes.

23 Q. And now you're going to explain that --

24 A. Yes.

25 Q. -- after you got some information from Mr.

1 Taylor?

2 A. Okay. I'm just not -- okay. He had two  
3 covers to do, okay -- two editions of the phone book  
4 cover. El Paso, at the time, had an A to L and an M  
5 to Z phone book. It was a big huge phone book. So  
6 you would do a cover for one phone book and one for  
7 the other. So on these covers is anywhere --  
8 probably about 20 to 23, 24 deliveries per each one.  
9 He had two sets -- we call them sets -- to do.

10 That's what we call them in our business, sets. We  
11 had a cover for A to L and a cover for M to Z. And  
12 the reason we did it that way was instead of going to  
13 El Paso twice and having to pay gas twice and motels  
14 twice and airline tickets twice, he could do both of  
15 them at the exact same time and collect all of the --  
16 anywhere between 40 to 45 ads that were on that  
17 cover.

18 Q. Okay. Now, what I was trying to get to  
19 here is back in 2000 again, on the El Paso trip,  
20 there are two covers. They each have 20-some ads on  
21 them?

22 A. Right.

23 Q. How many copies go to each one of the  
24 people who bought an ad -- how many copies of the  
25 cover?

1           A.    Let me explain to you briefly how our  
2   cover works.  People don't buy phone book covers.  
3   They buy ads on them.  We get a distributor in that  
4   area.  I happen to know this because I used them for  
5   many years.  It is the El Paso Association of  
6   Realtors.  They're a huge conglomeration.  We give  
7   the association the covers to get out and we sell the  
8   spaces on the cover to business advertisers because  
9   they want to go to that market.  They want to  
10   reach -- a home inspector would potentially want to  
11   reach somebody buying a house or a mortgage broker  
12   buying it.  That's how I sell it.  I sell them the  
13   ads and I tell them it's being given out by the Board  
14   of Realtors.

15           Q.   How do the telephone covers get from  
16   Cincinnati --

17           A.   Uh-huh.

18           Q.   -- to El Paso?

19           A.   In this instance it was because Mr. Taylor  
20   would have picked them up from the printer and took  
21   them with him.

22           Q.   How many covers are we talking about?

23           A.   About 2,000 covers.

24           Q.   2,000 covers?

25           A.   Uh-huh.

1 Q. And he would take them to the Board of  
2 Realtors?

3 A. He would take all but maybe a couple of  
4 hundred --

5 Q. Okay.

6 A. -- to the Board of Realtors and the couple  
7 of hundred that he kept, he would give copies to the  
8 people who bought ads on the covers.

9 Q. To the businesses he's collecting from?

10 A. Correct.

11 Q. How much would an ad cost on the cover,  
12 approximately?

13 A. Generally, at that time -- I've kind of  
14 raised the prices since -- anywhere between \$199 to  
15 \$300. Usually between 2- to \$300, roughly.

16 Q. So what would an average bill to an  
17 average advertiser -- I bought one ad on your  
18 cover -- a small ad because you can't get a big ad --  
19 too many of those on a telephone book cover --

20 A. Right.

21 Q. -- how much would that cost me for the ad?

22 A. I would say around \$250 or \$300.

23 Q. So he would be picking up 250- or \$300  
24 from approximately 50 people -- 50 different  
25 companies?



1           A.     About 40. Usually I would put about 20  
2     ads on a cover. Sometimes it's a little less;  
3     sometimes it's a little more depending on somebody  
4     might buy a double ad. In our business we do the  
5     work here first and then we bring it out. You often  
6     get people who don't want to pay.

7           Q.     If you can slow down just a little bit. I  
8     know enough about court reporting that if you go too  
9     fast, it's really hard to get it.

10          A.     I'm sorry. Well, roughly about 20  
11     companies on a cover and out of that 20 generally  
12     maybe three might not pay you because we do a  
13     business where they make sure it's correct, they make  
14     sure they're the only business of their type on this  
15     cover and then every now you just get someone who  
16     flat out isn't going to pay you.

17          Q.     Do you ever send bills to these companies  
18     and just have them pay you by mail?

19          A.     No.

20          Q.     Why not?

21          A.     Because that is how we sell it. It is  
22     sold that when the cover is done, you make sure it's  
23     correct, that you're exclusive and that's when we  
24     accept payment on it, so that's not how it was sold.

25          Q.     So you don't send them a proof and say is

1 this okay?

2 A. No. They pretty much know what their ad  
3 looks like because it's going to be like their Yellow  
4 Page ads most of the time.

5 Q. And most of the time the people pay when  
6 the --

7 A. Yes.

8 Q. -- covers are delivered?

9 A. Yes, they do.

10 Q. But you never made an attempt to try to  
11 collect the amount of the contract just by sending  
12 out an invoice?

13 A. No. In our business it would not work  
14 that way because it's not sold that way.

15 Q. Okay. I've just -- if my company buys  
16 Christmas cards imprinted, the company sends me a  
17 bill for the imprinted Christmas cards. They don't  
18 deliver them --

19 A. I see, but that's how they sold it to you,  
20 sir. If I sold you that suit that you're wearing  
21 right now and I said to you after it's tailored,  
22 after it's perfectly done for you, that's when you  
23 pay for it, you would not pay me until it fit you and  
24 it was tailored to you.

25 Q. But that was your business decision to

1 sell it that way?

2 A. That's how I was taught to sell so I don't  
3 know any other way.

4 Q. All right. Now, with regard to the tax  
5 returns, you know that as the person who files a tax  
6 return you can get a copy of your tax return; is that  
7 right?

8 A. Yes, I do.

9 Q. Okay. So if we requested copies of tax  
10 returns, you would be able to obtain them from IRS or  
11 the state or the city; is that correct?

12 A. I would think so. I mean, it's been --  
13 like I said, these are seven years ago.

14 Q. I understand, but it becomes important.  
15 It's part of the documentation --

16 A. I understand.

17 Q. -- of the case here. So would you be  
18 willing then to take the necessary steps to get those  
19 copies?

20 A. I'll try. I mean, I really don't even  
21 know what those steps are at this point it's been so  
22 long.

23 Q. If we made it easy for you to do that and  
24 gave you the instructions, could you -- would you do  
25 those?

1 A. I guess so. I don't see --

2 Q. Now, you say you have some tax returns at  
3 home probably, at least the last couple of years,  
4 2005, 2004?

5 A. Right.

6 Q. Maybe 2003?

7 A. Right, but these are from where we worked  
8 for other companies. You know, they're not from All  
9 American Marketing.

10 Q. I understand that. I understand that.  
11 You have no tax returns from All American?

12 A. Not for a while, no. I mean, my son is  
13 now 12 and, you know, as I said, the whole goal in  
14 the beginning back in '93 and '94 was so that I could  
15 have a baby and be -- I knew he was going to be my  
16 last child.

17 Q. I understand that. I'm just asking you  
18 for documentation --

19 A. Right.

20 Q. -- which was the purpose of this  
21 deposition.

22 A. Right.

23 Q. And I'd have to suggest to you if you do  
24 have documents, they are only in the form of tax  
25 returns, right?

1 A. Right.

2 Q. You don't have copies of any 1099s?

3 A. Yeah. I have some 1099s from other  
4 companies I worked for, yes.

5 Q. And there are no documents at all  
6 regarding Mr. Taylor's income from the musical  
7 performances he makes, right?

8 A. No.

9 Q. He never -- how did he get his jobs?

10 A. He had a booking agent that would book him  
11 jobs. He was very popular here.

12 Q. Did he have to -- did he have to pay the  
13 booking agent?

14 A. The booking agent basically -- I don't  
15 know how that worked. I really didn't -- I don't  
16 know how it worked. He had a booking agent. That's  
17 all I know.

18 Q. You have no idea how much income ever came  
19 in as far as his musical performances?

20 A. Well, it wasn't like he hid it from me or  
21 something. I mean, it was just I really wasn't  
22 interested in it. It wasn't what was going to pay  
23 the rent, okay, so I really wasn't -- other than, you  
24 know, whatever -- it just wasn't something I was that  
25 interested in. I did not like that. I did not like

1 the music business.

2 Q. So would I be correct in assuming that  
3 from '93 through today's date that Mr. Taylor's  
4 income would be derived from his musical performances  
5 and whatever income he got from either All American  
6 or these other companies that he works for?

7 A. Okay. I don't understand the question. I  
8 guess I have a question. Are you asking me --  
9 because he hasn't played music in a long time.

10 Q. Right.

11 A. All his income has been from delivery jobs  
12 for phone book covers.

13 Q. Okay. So whatever income there was within  
14 the last eight years would probably come from  
15 delivering the covers?

16 A. I can't remember exactly when he stopped  
17 playing music constantly. I don't remember exactly  
18 when that was, but I can say definitively in the last  
19 few years it's been nothing but -- the income that he  
20 has brought into the home has been from delivering  
21 phone book covers.

22 Q. I would like to continue this deposition  
23 in progress until you have an opportunity to review  
24 and get whatever records you can -- financial records  
25 for the income for All American or your joint

1 income --

2 A. Right.

3 Q. -- that you filed your income tax returns  
4 from.

5 A. I see.

6 Q. And then we'll have to reconvene it again  
7 once you are able to obtain those records. And what  
8 we're looking for are tax records starting in '93 all  
9 the way through 2005.

10 A. Well, I easily have the last three. I do  
11 not have the years prior to that anymore. It's been  
12 a very long time and I don't have them. I don't even  
13 think you're required by law to keep them after so  
14 long. I know that I do have 5s and 4s, possibly 3s,  
15 but before that I can't guarantee. And I know I  
16 don't have --

17 Q. Right. Well, whatever you have, you'll be  
18 able to produce and that would include 1099 forms --

19 A. Sure.

20 Q. -- for you and Mr. Taylor?

21 A. Sure.

22 Q. Not just you?

23 A. Whatever I have, I can bring in. I'm not  
24 saying that I have all of them and I know I don't  
25 have any of the '90s, not anymore.

1 Q. Then what we don't have that you can bring  
2 in, we can then talk about getting copies of through  
3 sending request forms through the taxing agencies?

4 A. Okay.

5 MR. HARDIN: With the understanding that  
6 this is continued in progress, I don't have any  
7 further questions.

8 MR. GANULIN: Mr. Taylor, do you have any  
9 questions?

10 MR. TAYLOR: Well, I would first just like  
11 to say --

12 MR. GANULIN: You can ask questions of  
13 your wife. If not, we can go off the record.

14 MR. TAYLOR: I really don't know what to  
15 say because I'd like to apologize if I've  
16 gotten out of line because this time yesterday  
17 I was in Tampa, Florida, so I'm not really on  
18 my game right now, and I drove.

19 So one thing that I'm -- I can be sure  
20 that none of you are musicians and the thing  
21 is -- I know you make the jokes about the  
22 musician, where we make the lawyer jokes. I  
23 won't do that, but I'll say when you are asked  
24 to perform in public or speak in public you  
25 don't want to have that little saying in the



1 back of your head about where somebody's going  
2 to come out of the crowd and say, hey, you were  
3 arrested for being with a prostitute. That's  
4 like the worst nightmare that you could ever  
5 imagine. I don't have the guts to do that.  
6 Maybe you do; I don't. One of the things that  
7 makes me admire Clinton because he can still  
8 keep going.

9 Let's see. My wife is not -- we didn't  
10 really discuss this because I knew she'd do a  
11 very good job, but one thing that she was not  
12 real clear on is that's when the music stopped.  
13 I never really told her -- I never really made  
14 it clear to her that's why I'm not taking jobs  
15 because I don't want to go out and face this,  
16 but because maybe none of you put yourself in  
17 that position of coming out on stage and, hey,  
18 it's a wonderful day and by the way, I beat the  
19 prostitution rap, you know. Okay. I know I'm  
20 not doing a very good job now. I'm half  
21 asleep.

22 MR. HARDIN: Let me just suggest to you,  
23 Mr. Taylor, what we're doing is taking a  
24 deposition of your wife. You'll have an  
25 opportunity to present your case when we go to

1 trial. And I understand what you're saying,  
2 but basically having -- I think your wife  
3 expressed it: it's not unusual for musicians  
4 to have girls throwing themselves at you and if  
5 you read the tabloids or look at the  
6 newspapers, it goes on all the time with rock  
7 stars and everything and it's almost a badge of  
8 courage, so --

9 THE WITNESS: Not getting a hooker.  
10 There's a difference between a groupie and a  
11 hooker.

12 MR. HARDIN: Okay.

13 THE WITNESS: There's a huge difference.

14 MR. HARDIN: I'm not going to argue the  
15 point right now, but I just want to say to you  
16 that this is not the time for us to get into  
17 that.

18 THE WITNESS: Right.

19 MR. HARDIN: All we're trying to do right  
20 now is you've been identified as the person who  
21 has the key to all the financial records and --

22 THE WITNESS: I'm going to give you what I  
23 can.

24 MR. HARDIN: -- and we haven't unlocked  
25 all the locks yet.

1 THE WITNESS: Right, I understand. I  
2 think what I'm -- what I wanted to be clear  
3 about, though, is you are right when you are --  
4 I do mean to say that when you're a musician,  
5 there's always girls. Everywhere you go  
6 there's women.

7 MR. TAYLOR: Oh, boy, it sounds like the  
8 inquisition.

9 THE WITNESS: It's quite different for him  
10 to go seek those women. That was the  
11 difference.

12 MR. HARDIN: I worked in the entertainment  
13 business for a while, so I know a little bit  
14 about it.

15 MR. TAYLOR: You did?

16 MR. HARDIN: Yeah.

17 MR. TAYLOR: Really?

18 MR. HARDIN: So anyway, I just want you to  
19 know that we will be contacting you again.

20 THE WITNESS: Sure.

21 MR. HARDIN: And if you -- if you would,  
22 if you find those records and get all the  
23 records you can find, I think if you call  
24 Mr. Ganulin, you know his number and  
25 everything --

1 THE WITNESS: Right.

2 MR. HARDIN: -- and then we can set up the  
3 deposition through his office. Thank you.

4 THE WITNESS: Thank you.

5  
6  
7 \_\_\_\_\_  
SHEILA TAYLOR

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10 DEPOSITION CONCLUDED AT 2:53 P.M.  
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## C E R T I F I C A T E

STATE OF OHIO :  
: SS  
COUNTY OF WARREN :

I, Kimberly L. Wilson, CSR, the undersigned, a duly qualified and commissioned notary public within and for the State of Ohio, do hereby certify that before the giving of her aforesaid deposition, SHEILA TAYLOR was by me first duly sworn to depose the truth, the whole truth and nothing but the truth; that the foregoing is the deposition given at said time and place by SHEILA TAYLOR; that said deposition was taken in all respects pursuant to stipulations of counsel; that I am neither a relative of nor employee of any of the parties or their counsel, and have no interest whatever in the result of the action; that I am not, nor is the court reporting firm with which I am affiliated, under a contract as defined in Civil Rule 28(D).

IN WITNESS WHEREOF, I hereunto set my hand and official seal of office at Lebanon, Ohio, this 5 day of FEBRUARY, 2007.



My commission expires: Kimberly L. Wilson, CSR  
June 15, 2009. Notary Public - State of Ohio